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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

STEVEN L. STANLEY,

Plaintiff,

v.

COMMUNITY DEVELOPMENT  
PARTNERS (CDP); GUARDIAN  
MANAGEMENT, LLC; VERIDIAN  
MANAGEMENT, INC.,

Defendants.

Case No. 3:21-CV-193-MO

**AFFIDAVIT OF COURTNEY B.  
McFATE IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTIONS TO  
DISMISS PLAINTIFF'S SECOND  
AMENDED COMPLAINT**

I, Courtney B. McFate, declare as follows:

1. I am an attorney with Lane Powell PC, attorneys of record for Plaintiff Steven L. Stanley. I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's Opposition to Defendants' Motions to Dismiss Plaintiff's Second Amended Complaint.
2. Plaintiff filed his Second Amended Complaint ("Complaint") on August 12, 2021.

3. On August 26, 2021, Defendants Community Development Partners (CDP) and Guardian Management, LLC filed their Motions to Dismiss Plaintiff's Second Amended Complaint, including motions to dismiss for failure to state a claim upon which relief can be granted under Fed. R. Civ. P. 12(b)(6), and a motion to strike under Rule 12(f).

**I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.**

Executed on September 9, 2021 in Portland Oregon.

s/ Courtney B. McFate

Courtney B. McFate